BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking Into Implementation of Federal Communications Commission Report and Order 04-87, As It Affects The Universal Lifeline Telephone Service Program

Rulemaking 04-12-001

(Filed: December 2, 2004)

Phase 2: Lifeline Certification Review

VERIZON CALIFORNIA INC. (U 1002 C) REPLY COMMENTS ON LIFELINE CERTIFICATION PROCESS

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January 18, 2008

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I. THE COMMISSION SHOULD ABANDON THE CURRENT SYSTEM IN FAVOR OF ONE WHERE CUSTOMERS ARE PRE-QUALIFIED PRIOR TO RECEIVING LIFELINE DISCOUNTS

Most of the parties commenting support a move to a pre-qualification process.[1] The Joint Consumers[2] do not support pre-qualification because a few customers may be unable to pay the upfront costs of installation and deposits. If the Commission moves to pre-qualification, the Joint Consumers propose that customers be required to pay the upfront monthly recurring charges, but nonrecurring charges (NRCs) for service establishment and deposits be deferred. If a customer is found ineligible for Lifeline, that customer would then be backbilled on an installment plan. The Joint Consumers base this proposal on the premise that the only reason for pre-qualification is the elimination of backbilling.[3]

But that premise is incorrect. In Opening Comments Verizon discussed five reasons to move to pre-qualification. In summary, (a) administration of the program becomes easier thereby reducing the costs of the program; (b) pre-qualification will reduce the burdens on Lifeline applicants who do not qualify by reducing the impact of backbilling on them; (c) pre-qualification gives customers an incentive to avoid delays in submitting certification documents in order to

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1 Under a pre-qualification system, discounted rates would not be granted upon service initiation. Instead, the customer is charged the full residential rate and once certified as eligible, the customer is then placed on the Lifeline program and given a credit for the difference between the full residential rate and the Lifeline rate for the period between service initiation and certification.

2 *See* Comments of The Utility Reform Network, The National Consumer Law Center, Disability Rights Advocates and Latino Issues Forum on Assigned Commissioner's Ruling Setting Scope of Phase 2 Issued November 14, 2007 (hereafter Joint Consumers Op. Comments).

3 *Id*. at 4-6.

receive the Lifeline discounts expeditiously, thereby diminishing customer-caused delays in processing Lifeline applications and associated costs; (d) if the Commission chooses to retain income-based eligibility, moving to pre-qualification will bring the Commission into full compliance with the FCC's Lifeline Order, and (e) moving to a system of pre-qualification will not burden most low-income customers because the Affordability Study demonstrates that most Lifeline subscribers (and by implication ineligible Lifeline applicants) can afford service initiation charges.

The Joint Consumers ignore all but one of these reasons and instead argue that the Commission must have more data about backbilling before making a policy change toward pre-qualification. But this argument is misplaced because there is sufficient data upon which to act. As AT&T has noted, based "on data from Solix, approximately 50% of certification customers enrolled in Lifeline are deemed ineligible for benefits and are required to be re-graded off of the program." (AT&T Op. Cm. at 1.) Verizon's own internal data bears this point out. As Verizon stated in opening, 50% of its customers who apply for Lifeline are ultimately found ineligible. Solix has also reported that 58% of certification customers send in their paperwork; conversely, 42% of those customers who state they are Lifeline-eligible upon first contact never return a certification form and are therefore then removed from Lifeline.

Verizon also found that approximately 30% of ineligible customers subsequently submitted certifications. These are customers who claimed to be eligible for Lifeline and upon first contact were enrolled in Lifeline service. These customers then failed to provide Verizon (previously) or Solix (currently) with any documents at all. These customers were backbilled for installation charges and full-rate MRCs, and all other charges, including the SLC, taxes, fees and surcharges. These customers then called Verizon to object to backbilling, again asserting eligibility. When Verizon explained that they had not been certified, these customers either said they would now send in the certification forms or asked for new certification forms since they had discarded the originals. These customers then submitted their certification forms and once Verizon received proof of certification, were re-enrolled in Lifeline. This required one of two actions: if the customer had paid the amounts backbilled, Verizon would apply a credit to the future bills. If the customer had not paid amounts that were backbilled, then Verizon would reverse those charges. Depending on how long this process took, Verizon would have already submitted claims to the State and Federal Lifeline funds for the amounts discounted; then would have had to adjust its claims to account for the backbilling, only to then have to again readjust its claims to collect on the discounts ultimately provided.

These customers are obviously particularly costly to the program because they require multiple levels of treatment, as just explained. Elimination of this multiple treatment problem is another reason to move to pre-qualification. As Verizon explained in opening, pre-qualification gives customers an incentive to avoid delays in submitting their certification documents in order to obtain Lifeline discounts expeditiously; thereby diminishing customer-caused delays in processing Lifeline applications—and all the associated costs and opportunities for error or confusion caused by multiple levels of treatment.

Joint Consumers are concerned that customers are faced with a large upfront installation charge and a deposit under a pre-qualification system. But there are ways to address this concern. As a matter of internal policy, Verizon does not take deposits from any of its residential customers, including Lifeline customers. As to Verizon's $46 installation charge, Verizon can provide all customers who apply for Lifeline with its tariffed 3-month installment plan. That means that, under a pre-qualification system, a customer applying for Lifeline would be billed $15.33 for installation costs on the first Verizon bill with the balance spread over the next two bills. If a customer represents an inability to pay the MRC in addition to this $15.33 installment, this customer could choose measured service (at $10/month, as opposed to $17.66/month for flat rate service) and once found eligible could convert to regular flat rate service with Lifeline discounts.[4] That would reduce the upfront charges by over $7 in Verizon territory. A customer who truly could not afford even this minimal amount could choose to pre-qualify prior to initiating service.[5]

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4 Verizon does not charge Lifeline customers for converting from measured service to flat rate service if the conversion is requested within the first 90 days of service. *See* Verizon Tariff A-22, Sheet 7, Special Condition 18 ("Customers may make up to two (2) subsequent changes (between flat-rate and measured service) within a ninety (90) day period without incurring a Service Order Change Charge for the two (2) changes.").

5 It is not clear whether Solix has the ability to pre-qualify a potential customer prior to that customer requesting service. If that ability does not currently exist, it should be instituted. The Affordability Study—discussed in Verizon's opening comments—demonstrates that many Lifeline-eligible customers have cell phones. A customer who is considering stopping cell service where the contract term is about to expire, may want the ability to pre-qualify without having to initiate service to avoid having simultaneous bills for both cell and landline service.

Joint Consumers' modified version of pre-qualification would have installation charges deferred until Solix makes a determination of ineligibility. If found ineligible, a customer would be backbilled for the NRC on an installment basis. This modification does not solve the problems backbilling creates for customers and the administrative costs it creates for carriers (and consequently the fund). Nor would it be much different than Verizon's proposal to provide customers with a 3-month installment plan to pay NRCs. Under the Joint Consumers' proposal, customers will be faced with a bill in Verizon territory that includes both the regular MRCs and the $15.33 backbilled installation charge. As to administrative costs involved, Verizon explained above the costs related to multiple levels of treatment. Moreover, other carriers experience similar costs. The Small LECs explain that:

> Under the current system, carriers are experiencing significant administrative complexities and difficulties regarding their claims. When a customer states that he or she is eligible for LifeLine, the carrier issues an immediate credit, and generates a claim to recover the lost revenues and associated amounts from the ULTS fund. At the same time, the carrier must claim the federal portion of the LifeLine discount from USAC. If the customer ultimately turns out to be ineligible, these amounts must be sought from the customer. If the carrier recovers the amounts, they are returned to the state and federal funds. This process has raised a host of accounting and administrative complications that would not arise under a pre-qualification regime. Carriers have been called upon to update claims from previous months once decisions regarding eligibility are rendered. Some USAC staff have also called into question the legitimacy of the discounts, since they are going to customers who are not certified at the time the discounts are given. A pre-qualification process would significantly simplify the carrier claims procedure, and would eliminate concerns that discounts are being given to ineligible individuals.[6]

[6] Small LECs Op. Cm. at 5-6.

USAC has also expressed concerns to Verizon as to whether the federal claims form, Form 497, is accurate given all the adjustments that multiple levels of treatment require.

II. THE COMMISSION SHOULD ELIMINATE INCOME-ELIGIBILITY

The Joint Consumers' arguments that using only program-based eligibility will exclude certain populations from qualifying for Lifeline are unpersuasive. Joint Consumers' analysis relies on information that 20% of the current applicants seek to establish eligibility using income certification. But given AT&T's description of its experience in Ohio,[7] this 20% number appears to be a reflection at best that the transition to Solix is not completed and that customers are still discovering that the new rules allow self-certification of program-based eligibility. Since implementing the FCC's requirement that customers prove income eligibility, the number of AT&T customers in Ohio qualifying under income-based criteria dramatically decreased from 20% in 2004 to 4% in 2007.[8] Verizon agrees with AT&T's assessment that California will likely see a similar decrease as customers recognize the convenience of self-certifying under the program-based criterion.

The objection to eliminating income-based certifications is that a small fraction of society might not participate in a government assistance program and therefore would need to prove eligibility by providing proof of income. Based on the Joint Consumers' analysis,[9] the only group that appears unable to use

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[7] AT&T Op. Cm. at 6.

[8] *Id.*

[9] Joint Consumers Op. Cm. at 10-11.

program-based eligibility is undocumented individuals or undocumented couples without children. This is the exact same group that Latino Issues Forum (LIF), The Utility Reform Network ("TURN"), Blue Casa, La Curacao and the Greenlining Institute explain live in a cash economy and have no proof of income. *See* D.05-04-026 at 12-13.

The Commission should balance the benefits of eliminating income certification against this theoretical population—a population that probably cannot provide proof of income in any event.[10] The benefits of eliminating income certification clearly outweigh the costs. As Verizon discussed at length in Opening Comments, the benefits of eliminating income certification include simplifying the certification process, as well as the overall administration of the program, reducing the amount of work that Solix would have to perform to review documentation, reducing bad debt claims, and the consequent reduction of costs to the fund and to end users.

III. THE COMMISSION SHOULD NOT USE ONE CERTIFICATION FOR ALL COMMISSION LOW-INCOME PROGRAMS

In an apparent effort to address Verizon's point that the Commission cannot use one certification for all Commission low-income programs, San Diego Gas and Electric Company (SDG&E) and Southern California Gas Company (SCG), clarify in early-filed reply comments how self-certification works for energy consumers:

> To clarify, CARE qualification is either based on self-certification of participation in a means-tested public assistance program ***or self-***

[10] Indeed, Joint Consumers have not provided any evidence that this group has any documentation that will satisfy the FCC requirement that documentation of income be submitted to prove income eligibility.

> ***certification of income*** with income verification (a request for documentation of income) conducted randomly on customers after enrollment in the CARE program has been completed. [SDG&E Op. Cm. at 3 (emphasis added).]

This clarification is useful to understand that energy customers may have an incentive to truthfully self-certify eligibility, given the specter of a possible audit. But this process does not comply with the FCC rule that customers must ***present*** proof of income ***prior*** to enrollment.[11] Thus, despite this clarification, Verizon maintains that the Commission cannot—consistent with the FCC rules—use enrollment in CARE as a basis of eligibility for Lifeline.

SDG&E and SCG also clarify that:

> LIEE . . . allows for qualification based on documented evidence of participation in a means-tested public assistance program or documentation of income eligibility, except in geographical areas targeted by the utility. ***Self-certification is accepted for these geographical areas*** because the demographics of the areas indicate that customers residing in those areas meet the LIEE program's income eligibility guidelines. [*Id*. (emphasis added).]

This clarification is useful in understanding that energy companies analyze geographic areas to allow for self-certification based on demographic data that "indicate" possible eligibility based on income. But the FCC rules do not allow for self-certification of income under any circumstances, and certainly does not allow for the type of geographic targeting that SDG&E and SCG explain in their clarification. Thus, Verizon maintains that the

[11] *See* 47 C.F.R. §54.410 ("Consumers . . . must present documentation of their household income prior to enrollment in Lifeline.").

Commission cannot—consistent with the FCC rules—use enrollment in LIEE as a basis of eligibility for Lifeline.

Finally, SDG&E and SCG clarify that:

> Also, LIEE applicants who have verified their eligibility for CARE through the program's verification process are automatically deemed income-eligible for the LIEE program since CARE and LIEE have identical income eligibility guidelines. [*Id*.]

This clarification is useful in understanding that a CARE customer can automatically qualify for LIEE. But, as discussed above, CARE customers can self-certify income (subject to a possible audit). Therefore, the Commission cannot—consistent with the FCC rules—use automatic enrollment in LIEE (through CARE) as a basis of eligibility for Lifeline.

CONCLUSION

For the foregoing reasons, Verizon supports moving to a pre-qualification system, eliminating income eligibility and moving to participation in a qualified public assistance program as the sole criterion for eligibility. The Commission, however, cannot use participation in the energy programs to qualify customers for Lifeline because those programs allow self-certification of income, which the FCC prohibits.

Dated: January 18, 2008

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 112 Lakeview Canyon Road, CA501LB, Thousand Oaks, California 91362; I have this day served a copy of the foregoing, **VERIZON CALIFORNIA INC. (U 1002 C) REPLY COMMENTS ON LIFELINE CERTIFICATION PROCESS** by electronic mail to those who have provided an e-mail address and by U.S. Mail to those who have not, on the service list.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of January, 2008 at Thousand Oaks, California.

/s/
JACQUE LOPEZ

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